

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

HENRIETTA KLEIN, derivatively, on behalf of
PFIZER INC.,

Plaintiff,

v.

DENNIS A. AUSIELLO, MICHAEL S. BROWN, M.
ANTHONY BURNS, ROBERT N. BURT; W. DON
CORNWELL, WILLIAM H. GRAY III,
CONSTANCE J. HORNER, JAMES M. KILTS,
JEFFREY B. KINDLER, GEORGE A. LORCH,
DANA G. MEAD, SUZANNE NORA JOHNSON;
STEPHEN W. SANGER; WILLIAM C. STEERE,
JR., FRED A. C. LEWIS-HALL, FRANK A.
D'AMELIO, and IAN READ,

Defendants,

and

PFIZER INC.,

Nominal Defendant.

C.A. No. 09-cv-7822-JSR

ECF CASE

[caption continues on the following page]

**DECLARATION OF GERALD H. SILK IN SUPPORT OF THE MOTION OF
AMALGAMATED BANK, AS TRUSTEE FOR LONGVIEW LARGE CAP 500 INDEX
VEBA FUND, LONGVIEW LARGE CAP 500 INDEX FUND AND LONGVIEW
QUANTITATIVE LARGE CAP FUND, FOR APPOINTMENT OF LEAD PLAINTIFF
AND LEAD COUNSEL AND CONSOLIDATION OF RELATED ACTIONS**

JAMES KENNEY, derivatively, on behalf of
PFIZER INC.,

Plaintiff,

v.

JEFFREY B. KINDLER, DOUGLAS M. LANKLER,
DENNIS A. AUSIELLO, MICHAEL S. BROWN,
ROBERT N. BURT, W. DON CORNWELL,
CONSTANCE J. HORNER, JAMES M. KILTS, DANA
G. MEAD; SUZANNE NORA JOHNSON, HENRY A.
MCKINNELL, DAVID L. SHEDLARZ, WILLIAM R.
HOWELL, STANLEY O. IKENBERRY, FRANKLIN
D. RAINES, RUTH J. SIMMONS, and JEAN PAUL
VALLES,

Defendants,

and

PFIZER INC., a Delaware corporation,

Nominal Defendant.

C.A. No. 09-cv-7913-JSR

ECF CASE

ROBERT J. CASEY and WILLIAM A.
HOUSTON, derivatively, on behalf of PFIZER
INC.,

Plaintiffs,

v.

DENNIS A. AUSIELLO, MICHAEL S. BROWN, M.
ANTHONY BURNS, ROBERT N. BURT, W. DON
CORNWELL, WILLIAM H. GRAY III, CONSTANCE
J. HORNER, JAMES M. KILTS, JEFFREY B.
KINDLER, GEORGE A. LORCH, DANA G. MEAD,
SUZANNE NORA JOHNSON, STEPHEN W.
SANGER, WILLIAM C. STEERE, JR., FRED A. C.
LEWIS-HALL, FRANK A. D'AMELIO and IAN C.
READ,

Defendants,

and

PFIZER INC., a Delaware corporation,

Nominal Defendant.

C.A. No. 09-cv-7983-JSR

ECF CASE

LOUISIANA SHERIFFS' PENSION AND RELIEF
FUND, derivatively, on behalf of PFIZER INC.,

Plaintiff,

v.

DENNIS A. AUSIELLO, MICHAEL S. BROWN, M.
ANTHONY BURNS, ROBERT N. BURT, W. DON
CORNWELL, WILLIAM H. GRAY III, CONSTANCE
J. HORNER, JAMES M. KILTS, JEFFREY B.
KINDLER, GEORGE A. LORCH, DANA G. MEAD,
SUZANNE NORA JOHNSON, WILLIAM C.
STEERE, JR., DOUGLAS M. LANKLER, FRANK.
A. D'AMELIO, IAN C. READ, and JOSEPH M.
FECZKO,

Defendants,

and

PFIZER INC.,

Nominal Defendant.

C.A. No. 09-cv-8042-JSR

ECF CASE

CATHY BUCH,

Plaintiff,

v.

DENNIS A. AUSIELLO, MICHAEL S. BROWN, M.
ANTHONY BURNS, ROBERT N. BURT, W. DON
CORNWELL, WILLIAM H. GRAY III, CONSTANCE
J. HORNER, JAMES M. KILTS, JEFFREY B.
KINDLER, GEORGE A. LORCH, DANA G. MEAD,
SUZANNE NORA JOHNSON, STEPHEN W.
SANGER, WILLIAM C. STEERE, JR., DOUGLAS
M. LANKLER, FRANK A. D'AMELIO, IAN C.
READ, JOSEPH M. FECZKO, HENRY A.
MCKINNELL, DAVID L. SHEDLARZ, WILLIAM R.
HOWELLSTANLEY O. IKENBERRY, FRANKLIN D.
RAINES, RUTH J. SIMMONS, JEAN-PAUL
VALLES, FRED A. LEWIS-HALL, and PFIZER
INC.,

Defendants.

C.A. No. 09-cv-8289-JSR

ECF CASE

AMALGAMATED BANK, AS TRUSTEE FOR
LONGVIEW LARGE CAP 500 INDEX VEBA
FUND, LONGVIEW LARGE CAP 500 INDEX
FUND and LONGVIEW QUANTITATIVE
LARGE CAP FUND, derivatively, on behalf of
PFIZER INC.,

Plaintiff,

v.

DENNIS A. AUSIELLO, MICHAEL S. BROWN, M.
ANTHONY BURNS, ROBERT N. BURT, W. DON
CORNWELL, WILLIAM H. GRAY III, CONSTANCE
J. HORNER, JAMES M. KILTS, JEFFREY B.
KINDLER, GEORGE A. LORCH, DANA G. MEAD,
SUZANNE NORA JOHNSON, WILLIAM C.
STEERE, JR., WILLIAM R. HOWELL, HENRY A.
MCKINNELL, STANLEY O. IKENBERRY, RUTH J.
SIMMONS, DOUGLAS M. LANKLER, FRANK. A.
D'AMELIO, IAN C. READ, and JOSEPH M.
FECZKO,

Defendants,

and

PFIZER INC.,

Nominal Defendant.

C.A. No. 09-cv-8363-JSR

ECF CASE

THE PORT AUTHORITY OF ALLEGHENY
COUNTY RETIREMENT AND DISABILITY
ALLOWANCE PLAN FOR EMPLOYEES
REPRESENTED BY LOCAL 85 OF
AMALGAMATED TRANSIT UNION,

Plaintiff,

v.

DENNIS A. AUSIELLO, MICHAEL S. BROWN, M.
ANTHONY BURNS, ROBERT N. BURT, W. DON
CORNWELL, WILLIAM H. GRAY III, CONSTANCE
J. HORNER, JAMES M. KILTS, JEFFREY B.
KINDLER, GEORGE A. LORCH, DANA G. MEAD,
SUZANNE NORA JOHNSON, STEPHEN W.
SANGER, WILLIAM C. STEERE, JR., DOUGLAS
M. LANKLER, FRANK A. D'AMELIO, IAN C.
READ, JOSEPH M. FECZKO, HENRY A.
MCKINNELL, DAVID L. SHEDLARZ, WILLIAM R.
HOWELL, STANLEY O. IKENBERRY, FRANKLIN
D. RAINES, RUTH J. SIMMONS, JEAN-PAUL
VALLES, FRED A. LEWIS-HALL and PFIZER
INC.,

Defendants.

C.A. No. 09-cv-8388-JSR

ECF CASE

SKANDIA LIFE INSURANCE COMPANY LTD.,

Plaintiff,

v.

JEFFREY B. KINDLER, DENNIS A. AUSIELLO,
MICHAEL S. BROWN, M. ANTHONY BURNS,
ROBERT N. BURT, W. DON CORNWELL,
WILLIAM H. GRAY III, CONSTANCE J. HORNER,
WILLIAM R. HOWELL, STANLEY O. IKENBERRY,
SUZANNE NORA JOHNSON, JAMES M. KILTS,
GEORGE A. LORCH, HENRY A. MCKINNELL,
DANA G. MEAD, FRANKLIN D. RAINES, DAVID L.
SHEDLARZ, RUTH J. SIMMONS, WILLIAM C.
STEERE, JR., JEAN-PAUL VALLES, FRANK A.
D'AMELIO, JOSEPH M. FECZKO, DOUGLAS M.
LANKLER, and IAN C. READ,

Defendants,

and

PFIZER INC.,

Nominal Defendant.

C.A. No. 09-cv-8544-UA

ECF CASE

I, Gerald H. Silk, declare as follows:

1. I am a member in good standing of the bars of the State of New York and of this Court. I am a partner in the law firm of Bernstein Litowitz Berger & Grossmann LLP. I submit this declaration in support of the motion filed by Amalgamated Bank, as Trustee for LongView Largecap 500 Index VEBA Fund, LongView Largecap 500 Index Fund, and LongView Quantitative Largecap Fund (“Amalgamated”), for appointment of Lead Plaintiff, approval of its selection of Bernstein Litowitz Berger & Grossmann LLP to serve as Lead Counsel, and for consolidation of all related actions.

2. Attached as Exhibits A through C are true and correct copies of the following documents:

Exhibit A: Declaration of Thomas B. O’Donnell;

Exhibit B: *In re OCA, Inc. Sec. & Derivative Litig.*, No. 05-2165, slip op. (E.D. La. Nov. 18, 2005); and

Exhibit C: Firm Biography of Bernstein Litowitz Berger & Grossmann LLP.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Executed this eighth day of October, 2008.

/s/ Gerald H. Silk
Gerald H. Silk